



[4830-01-P]

## DEPARTMENT OF THE TREASURY

Internal Revenue Service

26 CFR Part 1

[TD 9630]

RIN 1545-BK71

Use of Differential Income Stream as an Application of the Income Method and as a Consideration in Assessing the Best Method; Correction

AGENCY: Internal Revenue Service (IRS), Treasury.

ACTION: Correcting amendment.

SUMMARY: This document contains corrections to final regulations and removal of temporary regulations (TD 9630) that were published in the **Federal Register** on Tuesday, August 27, 2013 (78 FR 52854). The final regulations implement the use of the differential income stream as a consideration in assessing the best method in connection with a cost sharing arrangement and as a specified application of the income method.

DATES: This correction is effective [INSERT DATE OF PUBLICATION IN THE FEDERAL REGISTER], and is applicable beginning on or after December 19, 2011.

FOR FURTHER INFORMATION CONTACT: Mumal R. Hemrajani, at (202) 622-3800 (not a toll free number).

SUPPLEMENTARY INFORMATION:

### **Background**

The final regulations and removal of temporary regulations (TD 9630) that are the subject of this correction are under section 482 of the Internal Revenue Code.

## **Need for Correction**

As published, the final regulations and removal of temporary regulations (TD 9630) contains an error that may prove to be misleading and is in need of clarification.

## **List of Subjects in 26 CFR Part 1**

Income taxes, Reporting and recordkeeping requirements.

## **Correction of Publication**

Accordingly, 26 CFR part 1 is corrected by making the following correcting amendment:

### **PART 1--INCOME TAXES**

Paragraph 1. The authority citation for part 1 continues to read in part as follows:

Authority: 26 U.S.C. 7805\*\*\*

Par. 2. Section 1.482-7 is amended by revising the last sentence of paragraph (g)(4)(vi)(F)(2) to read as follows:

§1.482-7 Methods to determine taxable income in connection with a cost sharing arrangement.

\* \* \* \* \*

(g) \* \* \*

(4) \* \* \*

(vi)\* \* \*

(F) \* \* \*

(2) \* \* \* See Example 8 of paragraph (g)(4)(viii) of this section.

\* \* \* \* \*

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